

August 17, 2021

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PETER OPFENBER
CLERK US DIST COURT
WD OF WI

Patricia A. Downs

V

City of La Crosse et al.

21 CV 537 WMC

List of facts related to this cause of action:

1. Date of incident August 19, 2019
2. Time of incident, 11:20 am
3. Place of incident Theatre Rd. in Onalaska, Wisconsin
4. A red Ford van driven by officer Hughes nearly hit and killed me while I was walking on a public side walk in front of the Dahl Ford Dealership.
5. I tried to contact the driver to see if she was ok.
6. I was still walking towards the van when suddenly a man I recognized as Matt Mellotte exited a vehicle (full black ford with windows also tinted black).
7. I recognized both the vehicle and the person as La Crosse policeman and La Crosse police vehicle.
8. When Sgt. Mellotte did not ask if I was ok or tell me he called for police to speak with the van driver I immediately I knew nothing was incidental
9. I walked to the driver's door area and called into the open window that I wanted to talk to her (officer Hughes) but she ignored me and backed out of the spot and made her way to the driveway to leave the property.
10. Officer Hughes had to wait for traffic to clear and I was able to get the license information: PPU-309
11. I tried to reach Tim Kabat (the Mayor at that time) once I got to my home but just got an answering machine.
12. I did not further report what happened until the next week when I called the Onalaska Police Department and connected by telephone with a patrolman that took my information
13. Sometime after Labor Day the Onalaska P.D. contacted me and said they didn't see anything in the video from Dahl Ford. I was never offered to see the video and they would eventually close their part of investigating.
14. I continued to call the Mayor and he continued to tell me Rob Abraham told him that a few other police departments have a similar vehicle and I kept saying yea maybe but the La Crosse Police Department Sgt. Would not be getting out of any police vehicle except for a La Crosse PD one.
15. The purpose of my complaint is NOT money!

16. The purpose of my complaint is to expose what these individuals did, what these individuals tried to cover up. It's about how I was lied to by people that put on a badge and carry a gun in their everyday work life.
17. It's about desecrating the value and principles of an organization that citizens should trust and respect.
18. There is nothing in my past or present life that would cause the people listed as defendants to try to end my life like they did on August 19, 2021
19. The red Ford van listed weight is 1.97 ton
20. This is not the first attack by members of the La Crosse Police Department against me. In April of 2014 I was taken to the hospital by ambulance after being smashed into a cinder block wall.
21. While I lay unconscious on the frozen pavement a La Crosse Police Department representative pulled my right front tooth out of my head. This action woke me in time to see the female officer's hand arc down to her side.
22. In that action she dropped my tooth from the tool she used to pull it out.
23. It landed in the hollow of my throat and I put it into my pants pocket.
24. At the hospital another La Crosse Police officer asked me for my tooth! I told him it was mine and don't worry about it.
25. The male La Crosse officer at the hospital is one I'm familiar to and when he came upon the "incident" where my tooth was removed by a female La Crosse Police Department member, (whom I believe is also Officer Hughes) his remark was this, "that's right-no favorites".
26. I was 61 years old on the night my tooth was pulled and I was 66 years old the day I was nearly killed by officer Hughes driving a red van into me.
27. This is NOT about getting cash or a nest egg or any thing like that! It's about exposing the dirty underbelly of the actions of our local police department. Citizens, especially children and seniors are supposed to be protected by our fire and police not recoil in fear of them.